

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Leonard Ray Neil, Jr.  
**Debtor 1**

Leonard Ray Neil, Jr.

**Movant(s)**

v.

Freedom Mortgage Corporation

**Respondent(s)**

Charles J. DeHart, III, Esquire

Standing Chapter 13 Trustee

**Additional Respondent(s)**

**Chapter 13**

**Case No.** 1:17-BK-01324-HWV

**Matter:** Objection to Certificate of Default

**DEBTOR(S)' OBJECTION TO CERTIFICATE OF DEFAULT**

AND NOW, comes the Debtor(s), by and through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MRUPHY, who file the instant Objection to Certification of Default, and in support thereof avers that Debtor(s) are current with all post-Stipulation mortgage payments and stands ready to amend their Chapter 13 Plan to include stipulated arrears to be cured.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: March 8, 2021

/s/ Paul D. Murphy-Ahles

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